

# LUKAS, NACE, GUTIERREZ & SACHS

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February 26, 2008

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

Re: **EB Docket No. 06-36**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**

Hudson Valley DataNet, LLC	Form 499 Filer ID 822792
New Jersey DataNet Telecom, LLC	Form 499 Filer ID 822779
Connecticut DataNet, LLC	Form 499 Filer ID 825280

Dear Ms. Dortch:

On behalf of three affiliated companies, Hudson Valley DataNet, LLC, New Jersey DataNet Telecom, LLC and Connecticut DataNet, LLC, and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carriers' 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)  
Best Copy and Printing, Inc. (1)



John R. Galanti  
President

February 26, 2008

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

Re: Certification of CPNI Filing for Year 2007  
EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's rules, is a compliance certificate and accompanying statement for the year ended December 31, 2007 for Hudson Valley DataNet, LLC, Connecticut DataNet, LLC and New Jersey DataNet Telecom, LLC, collectively doing business as DataNet Communications.

Each of the company's FCC Form 499 Filer ID's are listed below:

Hudson Valley DataNet, LLC	822792
New Jersey DataNet Telecom, LLC	825779
Connecticut DataNet, LLC	825280

Should you have any questions regarding my response, please call me at (845) 458-7710 or by email at [jgalanti@datanet.net](mailto:jgalanti@datanet.net)

Sincerely,

A handwritten signature in black ink, appearing to read "J.R. Galanti", with a stylized flourish at the end.

attach

900 Corporate Blvd., Newburgh, NY, 12550  
(v) 845 458-7710  
(f) 845 567 6377



### CERTIFICATION

I, John R. Galanti, hereby certify this 26<sup>th</sup> day of February, 2008 that I am an officer of Hudson Valley DataNet, LLC, Connecticut DataNet, LLC and New Jersey DataNet Telecom, LLC, collectively doing business as DataNet Communications, that I am acting as an agent of these companies, and that I have personal knowledge that DataNet Communications has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2011. Attached to this certification is an accompanying statement explaining how each of these company's procedures ensure compliance with the Commission's rules.

A handwritten signature in black ink, appearing to read "John R. Galanti", is written over a horizontal line.

John R. Galanti  
President



## STATEMENT

DataNet Communications ("DataNet") has established a procedure for DataNet Communications Group, Inc. and each of its subsidiaries, including Hudson Valley DataNet, LLC, Connecticut DataNet, LLC and New Jersey DataNet Telecom, LLC, to protect Customer Proprietary Network Information ("CPNI"). The DataNet procedure:

- States that the policy of DataNet is that "CPNI will not be used for the purpose of marketing services, other than by affiliates of DataNet when marketing Datanet Service to a Datanet customer."
- DataNet continually educates and trains its employees regarding the appropriate use of CPNI and has established disciplinary procedures should an employee violate the CPNI procedure established by DataNet
- DataNet maintains a record of its and its affiliates' sales and marketing campaigns. No CPNI information has been used in these sales and marketing campaigns. DataNet's policy is that "DataNet will not use CPNI in any sales or marketing campaign."
- To DataNet's knowledge, no DataNet CPNI has been or obtained by any data broker in 2007 nor by any other third party. DataNet is not aware of any unauthorized release of CPNI and no customer of DataNet has complained regarding unauthorized disclosure of CPNI.



- The following is information DataNet has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI:
  - To my knowledge, no pretexter has attempted to obtain CPNI from DataNet
- The following is a summary of all customer complaints received in 2007 regarding unauthorized release of CPNI
  - Number of customer complaints DataNet received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None
  - Category of complaint:
    - o Zero Number of instances of improper access by employees
    - o Zero Number of instances of improper disclosure to individuals not authorized to receive the information
    - o Zero Number of instances of improper access to online information by individuals not authorized to view the information
    - o Zero Number of other instances of improper access or disclosure
  - Description of instances of customer complaints, improper access or disclosure: Not Applicable
- DataNet's President provides advice and counsel regarding compliance with the CPNI rules.